

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

ORIGINAL
RECEIVED
AUG 23 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re Application of) MM Docket No. 99-150
)
READING BROADCASTING, INC.) File No. BRCT-940407KF
)
For Renewal of License of)
Station WTVE(TV), Channel 51)
Reading, Pennsylvania)
)
and)
ADAMS COMMUNICATIONS) File No. BPCT-940630KG
CORPORATION)
)
For Construction Permit for a New)
Television Station to Operate on)
Channel 51, Reading, Pennsylvania)

DOCKET FILE COPY ORIGINAL

To: Administrative Law Judge Richard L. Sippel

READING'S FIRST MOTION FOR DOCUMENT PRODUCTION

In accordance with the Presiding Officer's *Order*, 99M-42 (released July 15, 1999), Reading Broadcasting, Inc. ("Reading") hereby moves for Adams Communications Corporation ("Adams") to produce the documents described herein for inspection and copying by Reading.

Definitions and Instructions

A. This Motion is continuing in character and, therefore, requires Adams to provide supplementary responses upon obtaining or discovering additional documents before the hearing.

No. of Copies rec'd 076
List ABCDE

B. This Motion calls for documents in the possession of Adams and/or Adams' officers, principals, employees, agents, representatives and, unless privileged, Adams' attorneys.

C. If any document is currently unavailable, it should be identified by author, date, and subject matter, and an explanation of why it is not available should be provided.

D. If production of any document is refused pursuant to a claim of privilege the document should be identified by reference to its author, recipient(s), date, and subject matter, and the basis for the privilege claimed should be set forth with sufficient precision to permit an assessment of the applicability of the privilege asserted. All documents for which no privilege is asserted or as to which no objection is asserted shall be produced.

E. "Document" means the original or any nonidentical copy or draft, regardless of origin or location, of any letter, memorandum, telegram, facsimile, report, record, study, handwritten notes, working paper, chart, paper draft index, tape, computer drive, disc, data sheet or data processing card, electronic storage medium, book, pamphlet, or periodical, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced, and however transmitted, together with any translations, instruction, or other written information necessary to render the material understandable.

F. “Regarding” means constitutes, contain, embodies, reflects, identifies, states, refers to, deals with, or is in any way pertinent to the specified subject, including drafts and documents concerning the preparation of other documents.

Documents Requested

1. All documents described in 47 C.F.R. §1.325(c)(1)(i)-(vi) and (ix)-(xii).
2. A copy of any FCC Form 301 application (except for the Adams application described in the caption above), including any amendments thereto, in which any officer, director or stockholder of Adams has held an interest, whether attributable or non-attributable, since 1980.
3. Any document regarding Adams’ proposed programming.
4. Any documents regarding Reading or its officers, directors and/or stockholders or television station WTVE (except for any documents produced by Reading pursuant to a public file request or document request).

Timing and Cooperation

It is requested that these documents be produced within 10 days of service pursuant to Section 1.325(a)(2) of the Commission's Rules. The documents should be delivered to the offices of Reading's counsel. In accordance with the Presiding Officer's statements on the record at the prehearing conference held July 13, 1999, counsel for Reading are prepared to confer and cooperate with counsel for Adams to the end that discovery issues are resolved without recourse to the Presiding Officer unless that cannot reasonably be avoided.

Respectfully submitted,

READING BROADCASTING, INC.

By: Thomas J. Hutton
Thomas J. Hutton
Randall W. Sifers

Its Attorneys

HOLLAND & KNIGHT LLP
2100 Pennsylvania Avenue, N.W.
Suite 400
Washington, D.C. 20037
(202) 955-3000

WAS1 #640920


CERTIFICATE OF SERVICE

I, Ellen Wallace a secretary in the law firm of Holland & Knight LLP do hereby certify that I have caused copies of the foregoing "Reading's First Motion for Document Production" to be hand delivered to the offices of the following:

The Hon. Richard L. Sippel
Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

James Shook, Esq.
Mass Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Gene A. Bechtel, Esq.
Bechtel & Cole, Chartered
Suite 250
1901 L Street, N.W.
Washington, D.C. 20036


Ellen Wallace